

DECLARATION OF AIDA MARTA RAMIREZ

I, Aida Marta Ramirez, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called on to testify I could and would do so competently and truthfully to these matters.
2. I lead the Ramirez Hormaza Law Group, an immigration firm located in Jacksonville and Pensacola, Florida.
3. I represent G.M.S.G., who is currently detained at the facility known as Alligator Alcatraz. He is eligible for release from detention on bond.
4. G.M.S.G. has experienced serious medical issues during his time detained at Alligator Alcatraz and has been hospitalized during his detention as a result of them. G.M.S.G. has anemia and carries the sickle cell trait. He was hospitalized at HCA Florida Kendall Hospital, 11750 SW 40th St, Miami, FL 33175, from July 10th to July 12th, during which he underwent a blood transfusion. His eyes are turning yellow, a possible sign of worsening anemia or liver involvement, and he currently has no follow-up care in place.
5. On July 16, 2025, I filed a motion for custody redetermination on G.M.S.G.'s behalf at the Krome Immigration Court. This motion was scheduled for a hearing on July 21, 2025.
6. At the hearing on this motion the judge rejected the motion, explaining that the Krome Immigration Court did not have jurisdiction to decide the motion, as my client was detained at Alligator Alcatraz. I inquired about what court had jurisdiction to decide the motion, and the judge told me that she did not know.
7. My staff was able to speak with G.M.S.G. on a recorded line about this case. They explained what it entails to be a class representative, and he agreed to represent the class and the subclass in this case.
8. G.M.S.G. wishes to proceed under pseudonym in this case. He also the consequences of publicly identifying himself as detained at Alligator Alcatraz, a facility that government officials have stated will hold only the "worst of the worst." He fears the stigma and potential for mistreatment that his public identification could bring on him and his family.

Executed this 29th day of July, 2025, at Pensacola, Florida.



Aida Marta Ramirez